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7	Attorneys for Defendant
8	UNITED STATES DISTRICT COURT
9	DISTRICT OF NEVADA
10	DEANNE SZELAP,)
11	Plaintiff,)
12	v.)
13) Case No.: 2:15-cv-00190-RFB-NJK CAROLYN W. COLVIN,
14	Acting Commissioner of Social Security,
15	Defendant.
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17	UNOPPOSED MOTION FOR EXTENSION OF TIME
18	(First Request by Defendant) COMES NOW Defendant Carolyn W. Colvin, Acting Commissioner of Social Security
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20	(Defendant), by and through her counsel, Daniel G. Bogden, United States Attorney, and Marla
21	Letellier, Special Assistant United States Attorney, to request that this Court extend the time to
22	respond to Plaintiff's Motion for Remand, which was filed on July 20, 2015 by 30 days from August
23	19, 2015 to September 18, 2015. This is Defendant's first request for an extension of time to respond
24	to Plaintiff's Motion. Counsel for Defendant contacted Plaintiff's counsel on August 18, 2015, and
25	Plaintiff does not oppose Defendant's motion. Defendants' current deadline is August 19, 2015.
26	The instant request is not intended to cause delay and is necessary because counsel for
20	Defendant will be out of the office from August 19, 2015 through August 21, 2015, and because of the

1	heavy workload of counsel for Defendant, who is responsible for briefing dispositive motions in six
2	federal district court cases between August 18, 2015 and August 28, 2015.
3	It is therefore respectfully requested that Defendant be granted a thirty (30) day extension of
4	time to respond to Plaintiff's motion, up to and including September 18, 2015.
5	Dated: August 18, 2015.
6	Respectfully submitted
7	DANIEL G. BOGDEN United States Attorney
8	/s/ Marla K. Letellier
9	MARLA K. LETELLIER Special Assistant United States Attorney
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11	OF COUNSEL: DEBORAH STACHEL
12	Acting Regional Chief Counsel
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15	IT IS SO ORDERED:
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17	UNITED STATES MAGISTRATE JUDGE
18	DATED: August 19, 2015
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